UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Timothy M. Donohue, hereby move this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Fred Daibes in the above-captioned matter.

I am in good standing of the bar of the State of New Jersey and there are no pending disciplinary proceedings against me in any state of federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached a declaration pursuant to Local Rule 1.3.

Dated: November 13, 2023

ARLEO & DONOHUE, LLC.

By: /s/ Timothy M. Donohue
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